

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<p><i>In re:</i></p> <p>HOUSTON REAL ESTATE PROPERTIES, LLC</p> <p style="text-align: center;"><u><i>Debtor,</i></u></p> <p>JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p>v.</p> <p>HOUSTON REAL ESTATE PROPERTIES, LLC, et al.,</p> <p style="text-align: center;"><i>Respondents.</i></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Case No. 22-32998 (Chapter 7)</p> <p>Adversary No. 23-03141</p>
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**SHAHNAZ CHOUDHRI'S EMERGENCY MOTION TO
RESCHEDULE DEPOSITION**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE

THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE JUDGE OF SAID COURT:

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Shahnaz Choudhri (“Shahnaz” or “Movant”) and files this Emergency Motion to Reschedule Deposition (the “Motion”) currently set to take place on November 8, 2024 and would respectfully show as follows:

**I.
SUMMARY OF REQUESTED RELIEF**

Movant’s deposition in this matter is presently scheduled for November 8, 2024 at 11:00AM in the attorney room at the federal courthouse for the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Late, on November 5, 2024, Movant became suddenly ill. Movant is currently addressing serious impacts to her health and is seeking emergency medical care. Unfortunately, due to this sudden and unforeseen illness, Movant is unable to attend the pre-scheduled deposition of November 8, 2024. Movant is willing to find another mutually agreeable time with opposing counsel to complete her deposition, subject to improvements to her health. Given the urgency of the requested relief, Movant respectfully seeks relief from the Court regarding this time sensitive matter by way of this Motion.

Lori Hood sent email correspondence to T. Michael Ballases on November 6, 2024 in an effort to reschedule the deposition for an alternate date, but an agreement could not be reached. (See Exhibit 1)

Emergency relief is requested on November 7, 2024, considering the deposition is scheduled for November 8, 2024 at 11:00am.

**II.
PRAYER**

Movant Shahnaz Choudhri respectfully requests that this Court grant this Emergency Motion to Reschedule Deposition presently set for November 8, 2024 at 11am.

Dated: November 7, 2024

Respectfully submitted,

/s/ James Q. Pope
James Q. Pope
TBN: 24048738
The Pope Law Firm
6161 Savoy Drive, Suite 1125
Houston, Texas 77036
Ph: 713-449-4481
jamesp@thepopelawfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on interested parties in the manner listed below on November 7, 2024.

23-03141 Notice will be electronically mailed, via the court's ECF noticing system to:

Thomas Michael Ballases on behalf of Plaintiff John Quinlan
ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Omar Khawaja
ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Osama Abdullatif
ballases@hooverslovacek.com

Matthew W. Bourda on behalf of Creditor Cypress BridgeCo, LLC
matthew.bourda@mhllp.com

Matthew W. Bourda on behalf of Creditor Magnolia BridgeCo, LLC
matthew.bourda@mhllp.com

Robert Paul Debelak, III on behalf of Creditor Cypress BridgeCo, LLC
bobby.debelak@mhllp.com

Robert Paul Debelak, III on behalf of Creditor Magnolia BridgeCo, LLC
bobby.debelak@mhllp.com

Robin L Harrison on behalf of Defendant A. Kelly Williams
rharrison@hicks-thomas.com

Angeline Vachris Kell on behalf of Plaintiff John Quinlan
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Plaintiff Omar Khawaja
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Plaintiff Osama Abdullatif
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Jennifer Lea MacGeorge on behalf of Defendant 2727 Kirby 26L LLC
service@jlm-law.com

Jennifer Lea MacGeorge on behalf of Defendant Jetall Companies, Inc.
service@jlm-law.com

Lenard M. Parkins on behalf of Defendant Shahnaz Choudhri
lparkins@parkinsrubio.com,
9141256420@filings.docketbird.com;bmcfadden@parkinsrubio.com

Steven A. Leyh on behalf of Plaintiff John Quinlan
leyh@hooverslovacek.com, graham@hooverslovacek.com

Steven A. Leyh on behalf of Plaintiff Omar Khawaja
leyh@hooverslovacek.com, graham@hooverslovacek.com

Steven A. Leyh on behalf of Plaintiff Osama Abdullatif
leyh@hooverslovacek.com, graham@hooverslovacek.com

Timothy L. Wentworth on behalf of Defendant Randy W Williams Ch7 Trustee
twentworth@okinadams.com, bmoore@okinadams.com

/s/ James Q. Pope
James Q. Pope

RE: Mrs. Choudhri's deposition

From: T. Michael Ballases (ballases@hooverslovacek.com)

To: lhood@shackelford.law

Cc: sabuzaid@shackelford.law; kmarino@shackelford.law; jamesp@thepopelawfirm.com; leyh@hooverslovacek.com; kronzer@hooverslovacek.com; beale@hooverslovacek.com

Date: Wednesday, November 6, 2024 at 03:19 PM CST

Lori:

The deposition is in now less than 2 days away, it is the second time it had be court ordered, and there are various deadlines in the near term. I cannot agree to move it again. We plan to go forward on Friday.

Thank you for your attention to this email.

T. Michael Ballases
Equity Partner



HooverSlovacek LLP
Galleria Office Tower 2
5051 Westheimer, Suite 1200
Houston, TX 77056
Office: 713-977-8686
Fax: 713-977-5395
www.hooverslovacek.com



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From: Lori Hood <lhood@shackelford.law>

Sent: Wednesday, November 6, 2024 9:43 AM

To: T. Michael Ballases <ballases@hooverslovacek.com>

Cc: Shifa Abuzaid <sabuzaid@shackelford.law>; Kimberly Marino <kmarino@shackelford.law>;

jamesp@thepopelawfirm.com

Subject: Mrs. Choudhri's deposition

Michael, Mrs. Choudhri is ill. She is not able to attend a deposition on Friday. Can we agree to an alternate date?

Lori Hood

Partner, LLM-Tax

SHACKELFORD, MCKINLEY & NORTON, LLP

717 Texas Avenue | 27th Floor | Houston, Texas 77002

832.669.6081 *direct* | 832.415.1801 *main*

832.367.3111 *cell* | 832.565.9030 *fax*

lhoo@shackelford.law | www.shackelford.law



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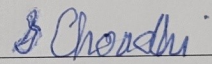
DECLARATION

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

My name is Shahnaz Choudhri, my date of birth is February 24, 1950. I have read the document filed on my behalf to continue my deposition until a time that I am feeling better, and I declare under penalty of perjury that the facts contained therein and as follows are true and correct.

I understand that I am to give my deposition tomorrow, November 8, 2024. I have been very ill for several days and am not getting better. I have been incapacitated and cannot attend a deposition tomorrow. I have told my lawyer that I cannot attend, and he has had my permission to file the motion to continue my deposition.

Executed in Harris County, State of Texas on the 7th day of November 2024.

By: 
Shahnaz Choudhri